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February 17, 2017

Via ECF

The Honorable Steven M. Gold, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Campbell et al. v. Empire Merchants, LLC*,
No. 1:16 Civ. 5643-ENV-SMG

Dear Judge Gold:

In accordance with Your Honor's directives at the Initial Conference held on February 10, 2017, the parties have conferred on a schedule for expedited discovery. And submit the below plan for the Court's approval.

The parties have agreed on the following deadlines:

- April 28, 2017 – Deadline to complete depositions
- May 5, 2017 – Deadline to complete expedited discovery

Today, Defendant served its First Set of Interrogatories and First Request for Production of Documents. Plaintiff's responses are due thirty (30) days thereafter, *i.e.*, March 20, 2017. Defendant also noticed Plaintiff's deposition for March 30, 2017. Because Plaintiff's counsel has advised they are unavailable on that date, Defendant has offered March 22, 23, 27, 28, 29 and 31 as alternative dates for Plaintiff's deposition and based on counsel's representation that they are available on four of these dates, subject to Plaintiff's availability, we anticipate concluding Plaintiff's deposition by March 31, 2017.

* * *

Thank you for Your Honor's courtesy and consideration of this matter.

The Honorable Steven M. Gold, U.S.M.J.
February 17, 2017
Page 2

Respectfully submitted,

/s/ Allen B. Roberts

Allen B. Roberts

cc: All Counsel of Record (via ECF)